

**UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA**

**IN RE:**

**TIMOTHY & STEPHENIE DYE  
DEBTORS**

**CHAPTER 13  
CASE NO: 13-71193**

**NOTICE**

**PLEASE TAKE NOTICE** that on the 7<sup>th</sup> day of August, 2013, at 01:30 pm, I will argue the attached Motions before the US Bankruptcy Court, sitting at the US Federal Courthouse, in Abingdon, Virginia.

**MOTION TO SHORTEN NOTICE REQUIREMENTS**

Come now the Debtors, by Counsel, and move the Court to shorten this Court's Notice requirements for setting Motions.

**MOTION TO EXTEND AUTOMATIC STAY UNTIL  
CONFIRMATION HEARING**

Come now the Debtors, by Counsel, pursuant to 11 U.S.C. §362(c)(3)(b) and move the Court to extend the automatic stay, and in support states as follows:

1. Debtors previously have filed a Chapter 13 case.
2. In 2011, Debtors filed Chapter 13 to pay their debts. The case was dismissed in 2013.
3. Debtors case was dismissed because they could not make their payments because Mr. Dye's employment was sporadic.
4. Mr. Dye now has a good job and is able, willing and ready to make all of the Chapter 13 Plan payments.
5. A wage deduct order has been sent to the Court to make sure the payments on this Chapter 13 Plan are timely made.
6. Debtors now have sufficient income to fund a Chapter 13 Plan which will pay their secured debts and a portion of their unsecured debts.

7. The Debtors are proceeding in good faith as to all creditors and are in a position to offer a Chapter 13 Plan to pay their creditors.

**WHEREFORE**, Debtors move the Court for an Order extending the automatic stay in this case until the confirmation date set in this case.

**TIMOTHY & STEPHENIE DYE  
BY COUNSEL**

**BY: /s/Tony M. Hutchinson  
VSB #28950**

**PO Box 16039  
Bristol, Virginia 24209  
276-669-4902**

**CERTIFICATE OF SERVICE**

I, Tony M. Hutchinson, Counsel for the Debtor, does hereby certify that I mailed a true copy of the foregoing Notice and Motions to all creditors on the matrix on this the 22<sup>nd</sup> day of July, 2013.

**/s/Tony M. Hutchinson  
TONY M. HUTCHINSON**